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Attorneys for Defendant
 WESTERN STATES CONTRACTING, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAY COLLINS,)	Case No.: 2:20-cv-00302-JAD-NJK
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	EXTEND DISPOSITIVE MOTION
vs.)	DEADLINE
)	
WESTERN STATES CONTRACTING,)	(FIRST REQUEST)
INC, a Nevada corporation; AND DOES)	
1-50, inclusive,)	
)	
Defendants.)	

IT IS HEREBY STIPULATED by and between Plaintiff JAY COLLINS (“Plaintiff”), through his counsel, Watkins & Letofsky, LLP, and Defendant WESTERN STATES CONTRACTING, (“Defendant” or “Western”), by and through its counsel, Fisher & Phillips LLP, as follows:

- On July 6, 2021, the Court entered the instant Scheduling Order granting the Discovery Plan submitted by the parties. ECF No. 37.
- The current deadline to file dispositive motions (September 30, 2021), shall be extended thirty-two (32) days, to November 1, 2021. The extension is necessary because the court reporter has not yet finalized the transcript for Defendant’s 30(b)(6)

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1 Witness, and Defendant's counsel has been covering cases for two colleagues who were
2 on leaves of absence for several weeks and accordingly has multiple competing deadlines.

3 3. This stipulation and order is sought in good faith and not for the purposes
4 of delay.

5 Dated this 9th day of September 2021.

6 WATKINS & LETOFSKY, LLP

JACKSON LEWIS P.C.

7
8 /s/ Theresa M. Santos

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Attorneys for Defendant
WESTERN STATES CONTRACTING,
INC.

16 **ORDER**

17 **IT IS SO ORDERED:**

18 
19 Nancy J. Koppe
United States Magistrate Judge

20 DATED: September 10, 2021
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